



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
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July 1, 2016

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2016 ETC Annual Report of Vermont Telephone Company, Inc.  
Study Area Code 147332**

Dear Ms. Dortch:

On behalf of Vermont Telephone Company, Inc. ("Vermont"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company's Five-Year Service Quality Improvement Plan Progress Report required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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July 1, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2016 ETC Annual Report of Vermont Telephone Company, Inc.  
Study Area Code 147332  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Vermont Telephone Company, Inc. (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2016 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Progress Report provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

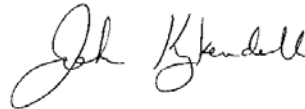
the attachment under seal. The Company uses the information contained in the Progress Report to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Progress Report provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Gordon Mathews
<035>	Contact Telephone Number: Number of the person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	gmathews@vermontel.com
Form Type		54.313 and 54.422

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no ) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no ) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

147332VT112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes



<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<300> Unfulfilled service request (voice)

0
---

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0
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<330> Detail on attempts (broadband)

Name of Attached Document



(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	3 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	1 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<b>(500) Compliance With Service Quality Standards and Consumer Protection Rules</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
147332VT510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations Data Collection Form		REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	147332VT610.pdf



FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<711>

-- See attached worksheet --



<b>(900) Tribal Lands Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO-VT
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035> Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

\_\_\_\_\_  
Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

\_\_\_\_\_  
Name of Attached Document



<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<1100>      Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130>      Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP [www.vermontel.com](http://www.vermontel.com)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2000) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<2010>	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support	<input style="width: 100px; height: 20px;" type="text"/>	
<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support	<input style="width: 100px; height: 20px;" type="text"/>	
<2022>	Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2024A>	Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 200px; height: 60px;" type="text"/>
<2024B>	Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<input style="width: 200px; height: 60px;" type="text"/>
<2025A>	Round 1 or Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	Name of Attached Document Listing Required Information	<input style="width: 200px; height: 60px;" type="text"/>
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100px; height: 20px;" type="text"/>

**(2000) Price Cap Carrier Additional Documentation (Continued)**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing  
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

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<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	147332VT3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	147332VT3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

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**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO-VT
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035> Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	147332
<015> Study Area Name	VERMONT TEL. CO-VT
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035> Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	JSI
Name of Reporting Carrier:	VERMONT TEL. CO-VT
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/30/2016
Printed name of Authorized Officer:	Frances Stocker
Title or position of Authorized Officer:	Chief Financial Officer
Telephone number of Authorized Officer:	8028857745 ext.
Study Area Code of Reporting Carrier:	147332 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	VERMONT TEL. CO-VT
Name of Authorized Agent Firm:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/30/2016
Name of Authorized Agent Employee:	Olivia D. Hill
Title or position of Authorized Agent or Employee of Agent	Sr. Regulatory Analyst
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	147332 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

## Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<210> For the prior calendar year, were there any reportable voice service outages?

Yes

<220>

<a>

<b1>

<b2>

<b3>

<b4>

<c1>

<c2>

<d>

<e>

<f>

<gg>

## <h>

[illegible]

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com

<701>	Residential Local Service Charge Effective Date	1/1/2016
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

**(710) Broadband Price Offerings**  
**Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	147332
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<015>	Study Area Name	VERMONT TEL. CO-VT
-------	-----------------	--------------------

<020> Program Year	2017
--------------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> gmathews@vermontel.com

<711>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	147332
<015>	Study Area Name	VERMONT TEL. CO-VT
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Gordon Mathews
<035>	Contact Telephone Number - Number of person identified in data line <030>	8028857712 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gmathews@vermontel.com
<810>	Reporting Carrier	Vermont Telephone Company, Inc.
<811>	Holding Company	Vermont National Telephone Company, Inc.
<812>	Operating Company	Vermont Telephone Company, Inc.

[illegible]

Vermont Telephone Company, Inc. (“Vermont Telephone”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules.

Vermont Telephone Company, Inc. is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Vermont Public Service Board (PSB) Rules 7.500 and 7.600, which discloses rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone

<sup>4</sup> *Id.* at n. 72.







In addition, Vermont Telephone Company, Inc. certifies compliance with broadband specific consumer protection obligations under federal law. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic.

Company complies with the FCC's backup power requirements, effective October 16, 2015.

<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

Vermont P.S.B. No. 1  
Vermont Telephone Co., Inc.

VERMONT PUBLIC  
SERVICE BOARD

7th  
Section 4  
Revised Sheet 24  
Cancels 5th Revised Sheet 24  
6th

4.14 VTel Plain Talk Service 2002 JUN 14 A 11:16

4.14.1 GENERAL

- (1) VTel Plain Talk Service is an optional local calling plan offered, subject to availability of facilities, as a supplement to one-party residence and business telephone exchange service.
- (2) This service provides for twenty hours of local calling from the customer's originating exchange to exchanges within the customer's local calling area as specified in Section 4.7. Message time in excess of the twenty hour allowance is charged for at the per minute rates shown in Section 4.13.3. Customers subscribing to Digital Subscriber Line (DSL) service will receive 8000 minutes of local calling when subscribed to Plain Talk Service. (T)
- (3) VTel Plain Talk Service rates apply only to customer-dialed station-to-station sent-paid calls when facilities are available for customer dial completion. The rates also apply to operator-completed station-station sent-paid calls for handicapped persons unable to dial calls because of their handicap. All other calls are charged for at the rates specified in Section 7.1.2. (T)
- (4) Accumulation of message time is done on a whole minute basis. Individual messages with fractional totals are rounded to the next higher minute.
- (5) There are no time of day restrictions with VTel Plain Talk Service.
- (6) VTel Plain Talk Service is not available for person-person, collect, charge to a calling card number, third party telephone number, conference or other calls which normally require an operator.
- (7) Subscribers to VTel Plain Talk Service may also subscribe to the Plain Talk Feature Package and are eligible for Plain Talk Additional Line discounts. Business and Residential packages and rates are set forth in Section 4.14.2 following. The calling allowance is applied in aggregate across all lines in the account subscribed to the Plain Talk Feature package
- (8) Plain Talk subscribers who also have DSL service are eligible for the Additional Line discount with or without subscription to the VahPak feature package

4.14.2 RATES AND CHARGES

- (1) VTel Plain Talk Service is provided at the following rates, which are inclusive of rates and charges for associated one-party main telephone exchange service. This rate does not include associated services, as appropriate.
- (2) The one time charge as specified in Section 6.1.2.B applies when VTel Plain Talk Service is ordered subsequent to the installation of a network access line.

Issued: June 10, 2002  
Effective: July 1, 2002

Michel Guité  
President

Vermont P.S.B. No. 1  
Vermont Telephone Co., Inc.

Section 4  
2nd Revised Sheet 24.1  
Cancels 1<sup>st</sup> Revised Sheet 24.1

4.14.2 RATES AND CHARGES (cont.)

(3)

Local Dial Tone Plus	Residential	.....	\$20.15 Monthly*	( I )
20 Hour Local Calling Allowance	Business	.....	\$30.00 Monthly*	
Local Dial Tone Plus DSL	Residential	.....	\$20.15 Monthly*	( I )
8000 Minute Local Calling Allowance	Business	.....	\$30.00 Monthly*	

\* Applicable whether or not calls are made. Each additional minute or fraction thereof charged at rates specified in Section 4.13.3.

(4)

ValuPak Feature Bundle – the following feature packages are available in conjunction with VTel Plain Talk Service for both primary and discounted Plain Talk Additional Lines.

ValuPak@Home	Call Waiting Conference Calling Return Call (*69) Repeat Dial TeenLine Call Trace Caller ID Name Caller ID Number Home Intercom Service No Receiver Off Hook Residential Call Hold	Call Forwarding Remote Access to Call Forwarding Call Forward Don't Answer Selective Call Forwarding Selective Call Acceptance Selective Call Rejection Anonymous Caller Rejection Priority Ringing/Call Waiting Speed Dialing Long Speed Dialing Short	\$2.00 Monthly
ValuPak@Work	Call Waiting Conference Calling Call Transfer Return Call (*69) Repeat Dial Distinctive Ringing Caller ID Name Caller ID Number Intercom Trunk Hunting Call Hold	Call Forwarding Remote Access to Call Forwarding Call Forward Don't Answer Selective Call Forwarding Selective Call Acceptance Selective Cal Rejection Music On Hold Speed Dialing Long Speed Dialing Short Call Pick Up	\$2.00 Monthly

Vermont P.S.B. No. 1  
Vermont Telephone Co., Inc.

Section 4  
4<sup>th</sup> Revised Sheet 24.2  
Cancels 3<sup>rd</sup> Revised Sheet 24.2

4.14.2 RATES AND CHARGES (cont.)

- (5) Plain Talk Additional Line - Residential - these rates available for up to two (2) additional lines. There is a minimum service commitment of one year for Plain Talk Additional Lines. (C)

Plain Talk Additional Line - Business - these rates available for up to four (4) additional lines. There is a minimum service commitment of one year for Plain Talk Additional Lines. (T)

Residential	\$14.95 Monthly	(I)
Business	\$14.95 Monthly	

\* 20 Hour Call Allowance (8000 Minutes for subscribers with both Plain Talk and DSL) applies to both initial and subsequent lines within an account. To receive an additional allowance on a subsequent line, that line must be subscribed to Plain Talk Service separately.

Vermont P.S.B. No. 1  
Vermont Telephone Co., Inc.

Section 4  
Fourth Revised Sheet 6

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.8 Local Flat Rate Service Rates

4.8.1 Residential Flat Rate Service

4.8.1 Business Flat Rate Service

SCHEDULE A - RESIDENTIAL AND BUSINESS SERVICE

TELEPHONE RATE CLASSIFICATIONS

<u>Rate Group</u>	<u>Base Rate Area</u>	<u>Zone A</u>	<u>Zone B</u>	<u>Zone C</u>	
Residence	\$16.75	n/a	n/a	n/a	( I )
Business	\$26.50	\$26.50	\$28.05	\$30.80	



Vermont P.S.B. No. 1  
Vermont Telephone Co., Inc.

Section 4  
First Revised Sheet 8

#### 4. LOCAL EXCHANGE TELEPHONE SERVICE

##### 4.8 Local Flat Rate Service Rates

(D)

(D)

##### 4.8.5 Flat Rate Semi-Public Line Service

#### SCHEDULE B - SEMIPUBLIC SERVICE\*\*

(C)

<u>Rate Group</u>	<u>Basic Rate Area</u>	<u>Zone A</u>	<u>Zone B</u>	<u>Zone C</u>
Semi-Public	\$23.80	\$25.00	\$27.40	\$31.00

(C)

\*\* See Section 5.2, for the applicable rules and regulations.

Vermont P.S.B. No.1  
Vermont Telephone Company

Section 4  
Fourth Revised Sheet 14

4. LOCAL EXCHANGE TELEPHONE SERVICE

4.11 Lifeline Telephone Service / Vermont Universal Service Fund

2002 JAN -7 A 10:51

4.11.1 Lifeline Telephone Service

Lifeline Telephone Service consists of a waiver of the monthly "Federal Subscriber Line Charge." In addition, there is a reduction equal to the greater of \$7.00 or 50% per month in the local exchange rate, including zone charges. These credits are effective with bills rendered on, or after the effective date of this tariff. In no event shall the basic monthly exchange charge be reduced below zero. (C)

This service is restricted to residential subscribers. To qualify for lifeline service rates, a subscriber must be income-eligible and must apply through the Vermont Department of Prevention, Assistance, Transition and Health Access or the Department of Taxes. The subscriber's name must then be provided to the Telephone Company by the Vermont Department of Prevention, Assistance, Transition and Health Access on a list of eligible participants. The list will be updated monthly and reconciled quarterly. Seasonal customers are ineligible for lifeline service. (C)

Vermont Universal Service Fund

All residence and business customers are subject to a Vermont Universal Service Fund surcharge. The surcharge is applied as a percentage (set by Vermont Department of Public Service and approved by Vermont Public Service Board) on most services contained in this tariff. Those services not subject to the surcharge are noted throughout the tariff. (C)

4.11.2 Responsibility of the Subscriber

Proof of eligibility for the Lifeline rate is provided to the Company by the Vermont State Department of Prevention, Assistance, Transition and Health Access. All questions of eligibility should be directed to the State Department of Prevention, Assistance, Transition and Health Access. (C)

4.11.3 Responsibility of the Telephone Company

The Company will reconcile quarterly the list of eligible telephone numbers within each local exchange. If a subscriber is identified as being ineligible, Lifeline rate treatment will be discontinued. The Telephone Company will not be held liable for errors in the identification of eligible customers. Its liability will be limited to reasonable and prudent handling of the information provided by the Department of Prevention, Assistance, Transition and Health Access. (C)

Vermont P. S. B. No. 1  
Vermont Telephone Company

Section 4  
First Revised Sheet 14.1

4. LOCAL EXCHANGE TELEPHONE SERVICE (Cont'd)

4.11 Lifeline Telephone Service/Vermont Universal Service Fund (Cont'd) DEC 19 A 11:01

4.11.4 Compliance with FCC Universal Service Fund Order 97-157

The service of an eligible customer receiving the Lifeline credit may not be disconnected from local exchange service for non-payment of toll charges, unless a waiver is granted by the Public Service Board.

An eligible Lifeline customer who elects toll blocking shall not be required to provide a service deposit to initiate service.

A Lifeline service customer may voluntarily choose to block toll calls and access to Interexchange Carriers. Blocking is provided to a Lifeline customer at no charge.

**Vermont Telephone Company, Inc. (SAC 147332)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Vermont Telephone Company, Inc. hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**